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**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA**  
**SACRAMENTO DIVISION**

JOSE URZUA,	)	Case No.: 2:23-cv-02772-EFB
	)	
Plaintiff,	)	STIPULATION AND ORDER FOR AN
	)	EXTENSION OF TIME
vs.	)	
COMMISSIONER OF SOCIAL SECURITY,	)	
	)	
Defendant.	)	

Pending the Court's approval, the parties hereby stipulate that the time for Defendant to respond to Plaintiff's Motion for Summary Judgment be extended thirty (30) days from May 3, 2024, up to and including June 3, 2024.

This is Defendant's first request for an extension, and it is made with good cause. This case was recently reassigned to undersigned counsel for Defendant, along with three other briefs, all of which are due in by early May 2024. Counsel now has eight briefs due in that timeframe, along with other litigation matters, and has preplanned leave for two weeks in May. Thus,

Defendant requires an extension in this case, and may require extensions in other cases, and requests this extension in good faith and with no intent to delay these proceedings unnecessarily.

The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

Respectfully submitted,

Dated: April 4, 2024

/s/ Bryan Konoski\*  
(\*as authorized by consent on April 4, 2024)  
BRYAN KONOSKI  
Attorney for Plaintiff

Dated: April 4, 2024

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By: /s/ Mary Tsai  
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Attorneys for Defendant

**ORDER**

Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an extension, up to and including June 3, 2024, to respond to Plaintiff's Motion for Summary Judgment.

Dated: April 8, 2024

  
EDMUND F. BRENNAN  
UNITED STATES MAGISTRATE JUDGE